

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

THE LAW OFFICES OF KANNER &
PINTALUGA, P.A., a Florida professional
corporation,

Plaintiff,

Case No.: _____

v.

EDWARD RYAN BRADLEY, an individual
d/b/a THE BRADLEY LAW FIRM,

Defendant.

_____/

COMPLAINT

Plaintiff, THE LAW OFFICES OF KANNER & PINTALUGA, P.A., a Florida professional corporation (“K&P”), hereby sues Defendant, EDWARD RYAN BRADLEY, an individual d/b/a THE BRADLEY LAW FIRM (“Bradley”), and alleges:

GENERAL ALLEGATIONS

1. This is an action for injunctive relief and damages in excess of \$15,000.00, exclusive of interest, costs and attorneys’ fees.
2. K & P is a Florida corporation with its principal place of business in Palm Beach County, Florida.
3. K & P operates a law firm that represents personal injury plaintiffs.
4. Bradley is an individual who purports to reside at 3051 N.E. 46th Street, Ft. Lauderdale, Broward County, Florida 33308 (the “Florida Property”).
5. Bradley has filed for and is receiving a homestead tax exemption on the Florida Property.

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6. Bradley is subject to personal jurisdiction in the State of Florida pursuant to, among other things, Florida Statutes § 48.193(1)(a)1, 2, 3 and 6.

7. Venue is appropriate in Palm Beach County because the causes of action alleged herein accrued here.

8. Bradley is licensed as an attorney in the States of Missouri and Illinois.

9. Bradley operates The Bradley Law Firm

10. The Bradley Law Firm maintains a website at www.thebradleylawfirm.com (the “Bradley Website”).

11. According to the Bradley Website, The Bradley Law Firm exclusively practices personal injury law.

12. According to the Bradley Website, Mr. Bradley is the only attorney practicing at The Bradley Law Firm.

13. The Bradley Website boasts that The Bradley Law Firm has offices in Missouri, Colorado and Illinois.

14. The only attorney identified on the Bradley Website, however, is not licensed to practice law in Colorado.

15. The Bradley Website actively solicits business from those who access it regardless of their location, including Florida.

16. In particular, but without limitation, the Bradley Website invites prospective client to “Call (866) 532-3849” or “Click here for a [free case evaluation](#).”

17. The Bradley Website has been accessed (published) in Palm Beach County and elsewhere.

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18. The Bradley Law Firm also maintains a website at www.stllawhelp.com (the “STL Website”).

19. The STL Website actively solicits business from those who access it regardless of their location, including Florida.

20. The STL Website has been accessed (published) in Palm Beach County and elsewhere.

21. Bradley has disseminated and continues to disseminate a defamatory blog post titled “Heard Of 411-Pain? Learn About The Fraud Case GEICO Filed Against This ‘Law Firm’” (the “Defamatory Post”), at www.stllawhelp.com/heard-411-pain-learn-fraud-case-geico-filed-law-firm.html, a copy of which is attached hereto as **Exhibit “A.”**

22. The Defamatory Post has been accessed (published) in Palm Beach County and elsewhere.

23. The Defamatory Post includes a solicitation for prospective clients to “Call 314-400-000” or “Click here for a free case evaluation.”

24. The Defamatory Post includes a “Live Chat – Online Now” option for those viewing the website in Florida and elsewhere to inquire about possible representation.

25. The Defamatory Post notes that K&P is a defendant in a lawsuit filed by GEICO, but improperly implies that K&P is guilty of theft, fraud, and otherwise unethical practices.

26. The Defamatory Post insinuates that K&P’s clients will receive less settlement funds from GEICO and encourages them to “call another lawyer.”

27. In particular, but without limitation, the Defamatory Post, referring to K&P, states, “Geico doesn’t think much of their business practices! Do you imagine GEICO is paying great

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settlements on injury cases where this law firm represents the injured person? We seriously doubt it!”

28. The Defamatory Post also implies K&P may not even be a law firm at all by referring to it with quotes around the descriptor “law firm” such as:

In fact, we are wondering if this “law firm” is disclosing to its prospective clients the fact that they are being sued for fraud.

29. The Defamatory Post goes on to accuse K&P of acting unethically by stating:

Wouldn’t it be a conflict of interest for this “law firm” to knowingly accept an injured person’s case if GEICO is the insurer?

30. The Defamatory Post then encourages K&P’s clients to discontinue their relationship with the firm:

If you are currently represented by this law firm, we encourage you to ask the hard questions to ensure your legal rights are properly protected. If you don’t get answers, call another lawyer. Remember, the choice of a lawyer can affect your life. Choose wisely.

31. All conditions precedent to the institution of this action have either been performed or waived or their performance would be futile.

32. K&P has retained undersigned counsel to represent them in this action and are obligated to pay a reasonable fee for their services rendered.

COUNT I
TORTIOUS INTERFERENCE (INJUNCTIVE RELIEF)

33. K&P realleges the allegations contained in paragraphs 1 through 32.

34. K&P has advantageous business relationships with certain identifiably injured persons throughout the state of Florida and the country.

35. Bradley had direct or indirect knowledge of those advantageous business relationships.

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36. Bradley has knowingly, and without justification, interfered with the advantageous business relationship between K&P and its clients, through the improper dissemination of defamatory material.

37. If Bradley continues to interfere with K&P's business relationships, K&P will suffer further irreparable harm in a manner impossible to ascertain.

38. K&P does not have an adequate remedy at law.

39. General public interest will be served by the prevention of further interference and dissemination of defamatory material by Bradley.

WHEREFORE, K&P demands entry of a temporary and then permanent injunction precluding Bradley from continuing to interfere with K&P's advantageous business relationships, along with such other and further relief as this Court deems just and proper.

COUNT II
TORTIOUS INTERFERENCE (DAMAGES)

40. K&P realleges the allegations contained in paragraphs 1 through 32.

41. K&P has advantageous business relationships with certain identifiably injured persons throughout the state of Florida and the country.

42. Bradley had direct or indirect knowledge of those advantageous business relationships.

43. Bradley has knowingly, and without justification, interfered with the advantageous business relationship between K&P and its clients, through the improper dissemination of defamatory material.

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44. Bradley's dissemination of defamatory allegations, including insinuations of theft, fraud, and unethical conduct, is an intentional and unjustified interference with K&P's business relationships.

45. As a result of Bradley's actions, K&P has suffered damages.

46. K&P lacks an adequate remedy at law.

47. K&P retains the right to seek leave to amend this pleading to seek punitive damages against Bradley.

WHEREFORE, K&P demands judgment against Bradley for damages, interest, attorneys' fees and costs incurred herein, along with such other and further relief as this Court deems just and proper.

COUNT III
DEFAMATION PER SE

48. K&P realleges the allegations contained in paragraphs 1 through 32.

49. Bradley published false statements accusing K&P of theft, fraud, being engaged in a scam, and unethical conduct to the public in general as well as specifically addressing business clients of K&P.

50. Bradley know or should have known that the statements were false.

51. The statements made and published by Bradley falsely impute to K&P conduct, characteristics, or a condition incompatible with the proper exercise of their lawful business, including allegations of having engaged in crime, tending to subject K&P to hatred, distrust, contempt, or disgrace, for the sole purpose of injuring K&P's trade and profession.

52. The statements made by Bradley exposed K&P to distrust and irreparably injured K&P's professional reputation.

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53. The statements contained in the Defamatory Post are defamatory *per se*.

54. K&P retains the right to seek leave to amend this pleading to seek punitive damages against Bradley.

WHEREFORE, K&P demands judgement against Bradley for damages, interest, attorneys' fees and costs incurred herein, and for such other and further relief as this Court deems just and proper.

COUNT IV
DEFAMATION PER QUOD

55. K&P realleges the allegations contained in paragraphs 1 through 32.

56. Bradley published false statements accusing K&P of theft, fraud, being engaged in a scam, and unethical conduct to the public in general as well as specifically addressing business clients of K&P.

57. Bradley know or should have known that the statements were false.

58. The statements made and published by Bradley falsely impute to K&P conduct, characteristics, or a condition incompatible with the proper exercise of their lawful business, including allegations of having engaged in crime, tending to subject K&P to hatred, distrust, contempt, or disgrace, for the sole purpose of injuring K&P's trade and profession.

59. The statements made by Bradley exposed K&P to distrust and irreparably injured K&P's professional reputation.

60. As a result of Bradley's defamation, K&P has been damaged.

61. K&P retains the right to seek leave to amend this pleading to seek punitive damages against Bradley.

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WHEREFORE, K&P demands judgement against Bradley for damages, interest, attorneys' fees and costs incurred herein, and for such other and further relief as this Court deems just and proper.

COUNT V
DECEPTIVE AND UNFAIR TRADE PRACTICES (INJUNCTIVE RELIEF)

62. K&P realleges the allegations contained in paragraphs 1 through 32.

63. Bradley's dissemination of the Defamatory Post constitutes an unfair method of competition, unconscionable act or practice, and unfair and deceptive act or practice in the conduct of trade in violation of Florida's Deceptive and Unfair Trade Practices Act ("FDUPTA").

64. As a result of Bradley's deceptive and unfair trade practices, K&P may lose potential clients or even existing clients.

65. If Bradley continues to engage in deceptive and unfair trade practices, K&P will suffer irreparable harm in a manner impossible to ascertain.

66. K&P does not have an adequate remedy at law.

WHEREFORE, K&P demands entry of a temporary and then permanent injunction precluding Bradley from continuing to engage in deceptive and unfair trade practices, along with such other and further relief as this Court deems just and proper.

COUNT V
DECEPTIVE AND UNFAIR TRADE PRACTICES (DAMAGES)

67. K&P realleges the allegations contained in paragraphs 1 through 32.

68. Bradley's dissemination of the Defamatory Post constitutes an unfair method of competition, unconscionable act or practice, and unfair and deceptive act or practice in the conduct of trade in violation of FDUPTA.

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69. As a result of Bradley's deceptive and unfair trade practices, K&P has lost potential clients and/or existing clients.

70. As a result of Bradley's deceptive and unfair trade practices, K&P has suffered damages.

WHEREFORE, K&P demands judgment against Bradley for damages, interest, attorneys' fees and costs incurred herein, along with such other and further relief as this Court deems just and proper.

Dated this 29 day of June, 2018.

SLUSHER & ROSENBLUM, P.A.

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THE
BRADLEY
LAW FIRM



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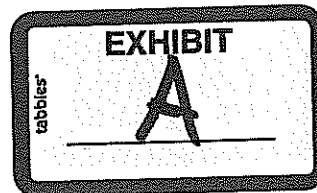
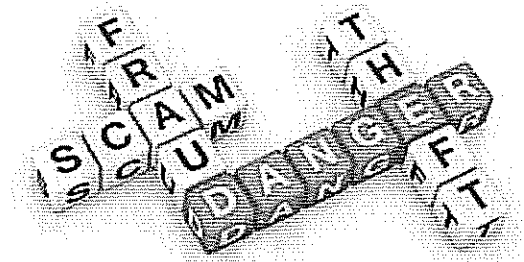
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CHAT LIVE

ONLINE NOW



You have probably seen the advertisements for "411-PAIN" plastered around the city, right? Well, Florida, 411-PAIN is a "legal / medical referral" service that is basically a one stop shop for people in car accidents. If you use their services, they direct you to their chiropractors and lawyers. While this is allowed in Florida, the practice is completely unethical in Missouri. Therefore, 411-PAIN operates in Missouri as only a law firm, leaving the medical referral service out of the picture.

Well, apparently one insurer had enough and filed a Fraud / RICO

lawsuit against 411-PAIN and the law firm behind it, Kanner & Pentalunga. You can read about the [411-PAIN Fraud Lawsuit here](#).

Ouch! Geico doesn't think much of their business practices! Do you imagine GEICO is paying great settlements on injury cases where this law firm represents the injured person? We seriously doubt it! In fact, we are wondering if this "law firm" is disclosing to its prospective clients the fact they are being sued for fraud. If you are a client of this law firm, isn't that something you would want to know? Wouldn't it be a conflict of interest for this "law firm" to knowingly accept an injured person's case if GEICO is the insurer?

If you are currently represented by this law firm, we encourage you to ask the hard questions to ensure your legal rights are properly protected. If you don't get answers, call another lawyer. Remember, the choice of a lawyer can affect your life. Choose wisely.

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